

DT: January 27, 1976

FM: John H. McKoy, Director of Planning
and Programming

TO: All Interested Parties

RE: Review of Effects on San Francisco
of the Proposed Crocker Hills
Development

J.H.M

The ABAG Executive Board on January 15, 1976 approved the attached report for transmittal to the San Mateo County Board of Supervisors, the San Francisco Board of Supervisors and all other affected parties. The report presents the findings and conclusions of a review conducted by ABAG staff under the direction of the ABAG Regional Planning Committee. The study was undertaken in response to a resolution received on October 16, 1975 by the Executive Board from the San Francisco Board of Supervisors which requested that ABAG review effects of the proposed Crocker Hills development on San Francisco.

Attachment

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Association of Bay Area Governments
Review Report
Approved by the Executive Board, January 15, 1976

Review of Effects on San Francisco
of the
Proposed Crocker Hills Development

Background

At its October 16, 1975 meeting, the Executive Board received a resolution from the San Francisco Board of Supervisors requesting that ABAG review the effects on San Francisco of the proposed Crocker Hills development on San Bruno Mountain. In accordance with ABAG's Procedures for the Review of Projects of Regional Significance, the Executive Board referred the request to the Regional Planning Committee for its consideration. At the recommendation of the RPC, the Executive Board agreed to have RPC conduct such a review based on available information. RPC findings and any recommendation it may have for consideration of additional potential effects or mitigation measures will be transmitted to the Executive Board for review and communication to all affected agencies.

Project Description and Status

In December 1973, Visitacion Associates, a joint venture of AMFAC, Inc., and Foremost-McKesson, Inc., proposed amendment of the San Mateo County General Plan to enable development of portions of San Bruno Mountain. A draft EIR was distributed for public review by the San Mateo County Planning Department last February. A consultant's fiscal analysis was distributed in mid-April. The developer's proposal currently calls for a combination of uses, including the construction of more than 7,000 mixed residential units with an ultimate population of approximately 18,500, and retail, office and warehouse development providing more than 6,000 jobs. Three alternatives to the Visitacion proposal were also developed as a result of County staff analyses and other input. Two of the alternatives would provide for smaller-scale development in the area, while the third would retain the entire area for recreation or preserve it in its natural state.

On November 26, 1975, the San Mateo County Planning Commission recommended approval of the Crocker Hills Plan Amendment and the adoption of a number of policies related to project implementation. The proposed policies deal with the preparation of specific plans, performance bonding and dedication agreements for lands to be used for various community facilities, the provision of local transit service to the development and the provision of low- and moderate-income housing.

In recommending approval of the development, the Planning Commission concluded that the project would have a significant adverse effect on the environment. The Planning Commission also recommended the certification of the Draft and Final Environmental Impact Reports as technically accurate and complete.

The San Mateo Board of Supervisors has scheduled its first hearing on the project for January 22, 1976.

Review Procedure

ABAG staff has reviewed the environmental documents prepared for the plan amendment, and other information available from the affected jurisdictions and from other agencies, to determine whether:

- a. Potential effects on San Francisco have been identified and adequately described;
- b. The significance of the potential effects has been appropriately evaluated; and
- c. All feasible mitigation measures have been identified.

An ABAG project review would normally consider the regional implications of a proposed action. This review, however, reflecting both the nature of the San Francisco Supervisors' request and the ABAG Executive Board's previous decision not to conduct such a review, has concentrated on the potential direct effects of the Crocker Hills development on San Francisco. The Committee will notice, however, that in some cases it has been impossible to dissociate effects on San Francisco from those upon the larger area. That the broader effects are not specified should not be interpreted as an indication of failure to recognize either the existence or significance of such effects on the jurisdictions other than San Francisco or on the region as a whole. In order to facilitate the Committee's review of the major issues while addressing all of the points raised by San Francisco, the staff report has been divided into seven subject areas, as follows:

1. Demography	5. Traffic and Circulation
2. Fiscal Impacts	6. San Francisco International Airport
3. Wastewater Treatment	7. Amenities: Recreation Needs and Scenic Resources
4. Public Transportation	

NOTE: References in parentheses refer to sources listed in the bibliography at the end of the report.

1. DEMOGRAPHY

A. Overall Population Effects

According to the County's Environmental Impact Report, San Francisco could be expected to lose 9,600 - 12,000 people to Crocker Hills over a 15-year period. (M, page 275) While the EIR concedes that the stimulation of migration from the City is a phenomenon that warrants serious concern by San Francisco, there is no available data which would enable projection, with any degree of accuracy, of the characteristics or scale of project-related out-migration. Consequently, it is not possible to quantify the secondary effects that this type of population change would have, such as depressed housing values or changes in residential vacancy rates. (M, pages 275-276) Examination of the proposal's residential characteristics, however, permits some general observations about the type of households Crocker Hills would be most likely to attract and the resultant effects on San Francisco. As it is presently planned, Crocker Hills would include a majority of rental units, no single family detached homes and few units with more than two bedrooms. Median rentals will likely be significantly higher than in either surrounding communities or the County as a whole.

(K, page IV-38-39) It is reasonable to speculate from these factors that those San Francisco residents (or potential San Francisco residents) attracted to the development are likely to be middle- and upper-income small households occupying high-rent or condominium units. The EIR concludes that, in the light of San Francisco's historic low vacancy rates, owners and renters who move into units vacated by San Francisco residents moving to Crocker Hills are likely to have socio-economic characteristics similar to those of the departing households, unless subsidy programs or housing costs change significantly.

Although it is reasonable to assume that San Francisco will experience some effects as a result of out-migration, the severity of the impact may be less than anticipated in the EIR and may occur over a longer period of time, according to a separate fiscal analysis prepared for the County. (N) Unlike the EIR, which concentrated on "worst case" effects, the fiscal impact analysis by Williams-Kuebelbeck and Associates, Inc., also included "most probable case" analysis. Two of the questions raised in that study relate to the development's appeal to San Franciscans and the developer's ability to market residential (as well as commercial and warehousing) space at the rates projected. (N, pages 24-28) In both cases, the analysts have concluded that the developer may be "overly optimistic" about the project's attractiveness.

B. Low- and Moderate-Income Housing and Subsidies

Another demographic effect of the proposal, according to the EIR, would be stimulation of migration into San Francisco by low- and moderate-

income employees of the Crocker Hills office and warehousing development. Because of the projected housing costs and the limited availability of housing subsidies for the project, it is anticipated that lower-income persons would seek housing in San Francisco and other locations outside the immediate project area. (M, page 277) This impact could be partially mitigated by the use of subsidies available under the Department of Housing and Urban Development's Section 8 program. (M, page 278) It is unlikely, however, that more than 100 units would be allocated to Crocker Hills since the County's entire allocation will be sufficient for only about 500 new subsidized units. (K, page IV-40) Moreover, the developer's statement that 15 percent of the units are intended to accommodate low- and moderate-income residents is conditioned on the availability of Federal or State subsidies. (M, page 278)

It should be noted that the County has estimated a current countywide need for 9,000 units of low- and moderate-income housing. As the County staff has suggested, since Crocker Hills would represent approximately 20 percent of the total growth projected to occur in the County by 1990, it should be viewed as a significant resource for meeting a portion of that need. (K, page IV-40) The County Planning Commission has recommended that the Board of Supervisors approve a policy requiring 20 percent of the units in each planning area to be available for low- and moderate-income housing. The recommendation limits the provision of this housing, however, by the availability of public subsidies as the developer has proposed. If this policy were implemented at Crocker Hills, it could increase the supply of lower-cost housing in the County as well as reduce the potential location of lower-paid Crocker Hills employees in San Francisco; but, given the inadequacy of State and Federal housing assistance, the inability of the Planning Commission's recommendation is uncertain. Early formulation of an implementation mechanism and assurances that the 20 percent would be secure and maintained regardless of the availability of public subsidies should be sought by the County.

2. FISCAL IMPACTS

There are no empirical data (M, page 275) to validate the potential impact of the anticipated population loss (9,600 - 12,000) from San Francisco to Crocker Hills on the marketability of comparable residential developments in the City. It is, therefore, impossible to conclude whether this population loss would be compensated for by new residents moving into San Francisco and seeking the same medium- or high-priced rental or condominium units in San Francisco vacated by San Franciscans moving to Crocker Hills. If housing units were to remain vacant in San Francisco, however, this might contribute to the deterioration of good housing in San Francisco, and, in turn, would reduce assessed valuations and contribute to a reduction in revenues for the City and County of San Francisco and San Francisco schools. Lacking data on these questions, it would be difficult to forecast a negative impact on San Francisco.

If, as indicated above, Crocker Hills is more likely to attract residents of high-price rental or condominium units than single-family owners, whose household size requires units larger than those to be provided in the proposed development, the project's effect on San Francisco could be an increased vacancy rate in the higher-price rental units with a minimal impact on the City's single-family neighborhoods and residential tax base.

The absence of conclusive data similarly limits any discussion of the project's effects on San Francisco's non-residential property tax base. In addition to the existing Crocker Industrial Park, which is adjacent to, but not part of the subject proposal, the project itself would provide 32.5 acres of retail-commercial development and 40.5 acres of office and industrial use--an estimated \$750 million worth of construction. (L, pages 1-16, 3-134)

When completed, Crocker Hills and the Crocker Industrial Park would offer about 10,000 permanent jobs, 45 percent of which, the DEIR states, would be new opportunities directly resulting from the development. (L, page 1-23) Approximately 80 percent of the future commercial, office and industrial tenants of the project would likely be drawn from other Bay Area locations. (L, page 3-122) The specific effect of the shift on San Francisco, however, is again difficult to assess. A loss of tax revenues would only occur if the vacated offices and industrial facilities could not be filled, notes the Final EIR. Vacancy rates in San Francisco office buildings, the consultant continues, are less than 3 percent for buildings over a year old and 6 percent for older structures, a relatively low rate which is likely to remain unchanged unless serious recessionary trends continue.

Of the 4,250 jobs attributed to the Crocker Industrial Park, 2,800 are existing and 1,450 are new positions which may be stimulated by the adjoining Crocker Hills development. (M, page 583) This development

could potentially affect the viability of similar San Francisco projects, including the India Basin Redevelopment Project. It is possible, however, that tenants attracted to India Basin and other San Francisco industrial areas because of the availability of a diverse labor force, access to port and railroad facilities and other urban amenities, would likely continue to find San Francisco a more attractive location. Those tenants who choose to locate in or near Crocker Hills will more likely be drawn from other similarly situated San Mateo County locations. Unlike the warehouse and office jobs, the 1,300 retail, service and educational jobs relating directly to the population would, of course, represent potential employment losses to San Francisco or from wherever else the Crocker Hills residents have moved. (M, page 584)

In the case of office activities, the DEIR assumes they are likely to be similar to those offered at other locations in San Mateo County: medical and health services, finance, insurance and real estate. (L, pages 3-150) As with industrial activity, San Francisco is likely to continue to attract those types of office tenants such as corporate headquarters, which have traditionally chosen to locate in the City.

Even though some property tax revenues may be lost to San Francisco, the DEIR estimates that some 52 percent of the project's wage earners are projected to reside in San Francisco. (L, pages 3-143) This projection is due at least in part to the fact that these wage earners are likely to come from low- and middle-income households unable to afford Crocker Hills housing costs. Long-range consumer revenues lost by San Francisco to Crocker Hills are estimated at \$59.3 million annually, compared with \$28.5 million exported from Crocker Hills to the City. Almost two-thirds of the total consumer expenditures by Crocker Hills households, however, will be based on salaries earned in San Francisco. (L, pages 3-132-145) These projections, however, are again based on the maximum development or "worst case" analysis provided in the EIR. If Crocker Hills is less successful--as anticipated by the Williams-Kuebelbeck analysis--the magnitude of these fiscal impacts on San Francisco would be less severe. Factors leading the fiscal analysts to that conclusion include the limited accessibility of the planned commercial sites and the existence of substantial competition from other suburban and office complexes. (N, pages 27-28)

Finally, it should be noted that no measures have been proposed to mitigate the project's potential fiscal effects on San Francisco (or other jurisdictions) resulting from either reduced consumer expenditures or reductions in assessed valuation. In the absence of some type of system for regional sharing of tax resources, actions by one jurisdiction to reduce the secondary economic effects of its land use decisions on another unit are virtually out of the question. Further, cities with large commuter populations are not allowed by law to levy payroll taxes. The only mitigation measures open to ABAG and its member jurisdictions may well be limited to support of measures for revitalization and strengthening the revenue base of existing cities to whatever extent that may be feasible.

3. WASTEWATER TREATMENT

Wastewater treatment for the Crocker Hills development would likely be provided at two separate treatment facilities, the South San Francisco-San Bruno Plant and San Francisco's Southeast Water Pollution Control Plant. Although final plans for sewage conveyance and treatment have not yet been developed, it is reasonable to assume that sewage collected from the Saddle, Northeast Ridge and Brisbane sites (comprising almost 80 percent of the acreage to be developed) would be collected by the Guadalupe Valley Municipal Improvement District's sewage system and conveyed to the San Francisco Southeast Plant for treatment. (L, 3-206-207) An agreement between the District and the developer provides for the transportation of up to 3,000 gallons per minute (gpm) of sewage through the District's system to the San Francisco plant during peak wet-weather flows. (L, 3-209) Another 1972 agreement between the District and the City and County of San Francisco provides for treatment of up to 6.7 million gallons (4,700 gpm) of sewage a day during peak wet-weather flows. (A) This second agreement, which is not mentioned in the EIR, has been the basis for some of the concerns related to wastewater treatment.

The Southeast Treatment Plant was designed to provide primary treatment for a peak flow of 70 mgd. The present average dry weather flow is about 19 mgd. (E, page III-16) In order to comply with the requirements of the Federal Water Pollution Control Act, however, the plant must be upgraded to provide secondary treatment by 1977. Moreover, since 1969 the Southeast Plant has been cited on a number of occasions by both the Regional Water Quality Control Board and the State Water Resources Control Board for violations of discharge requirements. The Regional Board is now considering a ban on any additional connections to San Francisco's entire system because of the City's failure to correct these violations. (A)

Expansion and upgrading of the Southeast Treatment Plant are, therefore, critical to San Francisco's capability to handle any new waste loads, including the Crocker Hills effluent. The extent to which Crocker Hills flows will impact upon San Francisco's treatment capacity will depend, however, upon the State's determination of the treatment capacity eligible for State and Federal funding. No decision has yet been made by the State on capacity. Consequently, contrary to the statement in the DEIR, it is not possible to conclude that the Southeast Plant will be treating an average flow of 150 mgd by 2020. (L, page 2-207) The City has proposed that sizing should be adequate to handle wet weather flows in order to alleviate problems related to its combined storm drain and sewer systems. The State staff estimates that this would yield a capacity of 155 mgd by 1985. If the sizing is based on dry weather needs, however, 85 mgd would probably be used. It is unclear whether this figure would include Crocker Hills and other flows from northern San Mateo County as well as the capacity required for San Francisco. Since the current average dry weather flow from the Southeast service area, San Mateo County and the City's Northpoint

Plant (which would be phased out once Southeast is upgraded) totals about 80.2 mgd (B, pages 28, 54), limiting capacity to 85 mgd could severely limit San Francisco's future growth. The DEIR estimates that the dry-weather flow contributed by Crocker Hills alone would be about 1.2 mgd by 1990 (L, pages 3-211).

Although San Mateo County itself would probably be unable to take steps to alter the effects Crocker Hills may have on San Francisco's treatment capacity, the State could mitigate the project's impact by ensuring that its determination of eligible capacity takes account of likely growth in the San Mateo County portions of the service area and San Francisco's contractual agreements to provide wastewater treatment to development there. In the event that the State allows for less San Mateo County capacity than San Francisco may be obligated to provide as a result of agreements, revisions to the contracts might be necessary in order to ensure that treatment capacity would be available for future San Francisco growth. The requirement of water conservation devices in Crocker Hills units might also help to mitigate effects on San Francisco's treatment system.

4. PUBLIC TRANSPORTATION

The San Francisco City Planning Commission last fall adopted a series of policies related to Peninsula transit which clarify the bases for the City's concerns about Crocker Hills' potential effects on public transportation. The most significant policies for this discussion call for:

- a. No transfer service from the Peninsula to downtown San Francisco;
- b. Reverse commute service for San Franciscans employed in key Peninsula locations including the Crocker Industrial Park;
- c. Transit service to San Francisco destinations outside the downtown area;
- d. Transit routes that avoid travel on San Francisco local streets;
- e. Limitations on BART parking facilities in favor of effective feeder bus service; and
- f. Financial compensation as a precondition of any Peninsula transit links to the Daly City BART line. (O, pages 3-13)

It is noteworthy that Crocker Hills proximity to the Daly City BART station has been frequently identified as one of the proposal's most positive attributes. "Because Crocker Hills is located centrally to both the population mass and existing transit systems, increased demand for transit will be less expensive to serve than a similar development on the periphery of the urban area," the DEIR states. (L, page 3-175) Although increased parking and platform congestion at the Daly City Station are mentioned as negative impacts, the project is identified as having a beneficial impact on transit patronage "... creating greater utilization of existing underemployed public and private transit investments." (L, page 3-191) Considering BART's present problems and the fact that neither San Mateo County or its residents have an investment in the BART system, this comment needs amplification. In 1973-74, San Franciscans paid \$109.15 per capita in taxes for regional transit compared with \$3.95 in San Mateo County. (O, page 6) The EIR consultant acknowledged the existence of "regional equity issues" but added that such problems were not created by Crocker Hills and would not be solved were it not built. (M, page 588) Although the fiscal effects of the Crocker Hills BART usage is not considered, an attempt was made to quantify the effects on BART capacity.

The San Francisco City Planning Department has stated that of the 8,600 seats on the BART Daly City line during the morning peak, 4,700 to 5,400 are currently being filled by patrons boarding at Daly City. (O, page 12) Quoting the Supervisor of BART Schedules, the Final EIR states that there are actually 5,112 seats available on the Daly City line at the peak hour.

With half the passengers standing, a total of 10,224 could be accommodated. Assuming an increase in the line's peak hour capacity to 32,400 by 1990, the 856 projected Crocker Hills riders would constitute 2.6 percent of the peak load. (M, page 279) Since transit impacts have been considered only with respect to peak hour/peak direction conditions, neither the overall use of BART by Crocker Hills riders nor the fiscal or capacity effects of such usage have been evaluated. Also, the consultant has not considered other factors which might contribute to increased BART usage by San Mateo residents and a reduction in available capacity. The San Francisco Planning Department says, for example, that if new bus systems envisioned in either the San Mateo County Local Bus Transit Study or the Southern Pacific Upgrading Study terminated at Daly City, BART could receive 10,000 to 15,000 additional San Mateo County patrons. (Q, page 13) It must also be noted that these projections assume the most rapid build-out rate and the highest level of transit usage. The longer it takes to complete Crocker Hills, the more likely it will be that BART capacity has increased -- contingent, of course, upon resolution of present technical and financial difficulties.

As noted above, the inadequacy of parking facilities at the Daly City BART station has been acknowledged. It is assumed that a significant number of the BART riders would, therefore, utilize the developer-proposed transit system during peak hours. It is not clear, however, whether the same rate of transit use to and from BART would occur during off-peak hours. The County Planning Commission has recommended the Supervisors' approval of a policy specifying provision by the developer of transit service for the Northeast Ridge and Saddle areas once a residential population of 300 has been established. According to the developer, this service would initially involve vans operating on a dial-a-ride basis between the development, BART and the Southern Pacific. Later service would probably involve larger buses as well requiring an ultimate outlay of \$230,000 for rolling stock. (M, pages 256-257)

Such a system, providing direct service to BART, would conflict with San Francisco Planning Commission policy unless the BART district were compensated the equivalent of "buy-in" costs and provided with payments to cover ongoing costs and operating deficits on an equal basis with other BART members. (Q, page 6) It is reasonable to assume that any attempt to expand such a system to the point where public funds were to be used and regional approvals required would not be supported by San Francisco. One of the alternative financing strategies cited in the Crocker Hills Bus Service Plan, for example, would allow for ownership of the fleet by the San Mateo Transit District with a private operator carrying out the service. With estimated revenues of \$226,000, about \$372,000 or 2 percent of the District's three-year operations budget would be required to run the Crocker Hills system. (Q, Exhibit A) This would amount to about 9 percent of the District's anticipated \$4.3 million operations deficit. (P, page VI-55) San Francisco, San Mateo County and the BART District are currently evaluating transit issues and possible joint policy considerations for West Bay regional transit services as part of the Metropolitan Transportation

Commission's Peninsula Transit Alternatives Study. Since the success of the Crocker Hills system may well depend on the regional transit recommendations for the Peninsula that emerge from this study, it would be an appropriate forum for addressing the conflicts identified in this review.

Without voter approval it is questionable what steps might be taken by San Mateo County toward reducing the fiscal effects on all BART counties of increased usage by a non-participant. If direct service to downtown San Francisco were required as San Francisco has suggested, however, the demand on BART capacity could be substantially relieved. Although San Francisco has also expressed concern about the use of MUNI by Crocker Hills passengers, this effect will not be as significant. Voorhees Associates assumed that there would be no incentive to ride MUNI to downtown San Francisco, as long as BART is available, because of the slowness of the service. 126 peak-hour trips to other parts of the City have been assigned to MUNI however. (M, page 282). Again, because the examination has been limited to peak-hour/peak-direction situations, the overall impact on MUNI has not been assessed.

Finally, the EIR doesn't include any estimate of the transit improvements that will be required to maintain the projected level of transit usage or the costs associated with such facilities. In one instance, for example, the consultant learned that MUNI was proposing to curtail service on a line projected to accommodate Crocker Hills riders. (M, page 282) Since the inadequacy of transit service between Crocker Hills and San Francisco could mean an increased adverse effect on the City's local streets and highway access, such investigations should be conducted as soon as possible. It would be desirable if San Francisco could be assisted with the cost of financing such improvements to the extent that they will be utilized by Crocker Hills residents.

5. TRAFFIC AND CIRCULATION

Concerns about Crocker Hills' potential effects on San Francisco's circulation system relate to impacts on both freeways and local streets and upon the City's parking accommodations. Based on the traffic analyses conducted for San Mateo County by Alan M. Voorhees and Associates, Crocker Hills would generate about 100,000 person trips every day. From 81 to 91 percent of the project-related travel would be by automobile. (L, page 3-175)

If 19 percent of all trips are made by transit, Crocker Hills residents would generate 1,015 auto trips to San Francisco during the busiest hour every workday morning. This figure converts to a daily total of 5,090 auto trips to and from downtown San Francisco alone. With 9 percent transit patronage 5,100 downtown round trips would occur. This would result in a need for about 1,500 parking stalls or 2 percent of 64,820 off-street spaces now available in the downtown area. The consultants emphasized that since a number of these trips would be made by persons who already work in San Francisco, they shouldn't be viewed as an additional demand. (M, pages 283-284) It is likely, however, that many of those Crocker Hills residents who move there from San Francisco would have formerly used public transportation to get downtown.

In both transit alternatives the consultant identified a significant adverse impact on segments of Bayshore Boulevard and Mission Street. Project traffic was also projected to have a slight adverse impact on Geneva Avenue. (L, Table BB-1) Impacts on both the Bayshore Freeway (Route 101) and Interstate 280 are described as minimal and "...marginally significant...in light of the tremendous volumes projected as a result of general population growth." (L, pages 3-186-187) This conclusion is not based on any specified criterion. Even with 19 percent overall transit usage, Crocker Hills auto traffic is projected to account for 5.5 percent of the peak-hour traffic on the Bayshore Freeway at the County line, 3.2 percent at the I-80 junction and 1.6 percent at the San Bruno interchange. (L, page BB-9) On Interstate 280, peak-hour Crocker Hills traffic would contribute .3 percent, at the Route 1 junction, 1.8 percent at the County line and 3.8 percent at the Route 101 junction. The conclusion that such impacts are "minimal" appears highly inappropriate and is not adequately substantiated. Moreover, in light of the fact that the 19 percent transit usage figure may be too high, the project's impact on both the freeway system and local streets may be even higher.

In comments on the DEIR, MTC staff questioned the 19 percent transit usage noting that even with improved rail and bus service there was

no explanation why transit use should be higher for Crocker Hills than other similar middle and upper income developments. (M, page 126) Voorhees justified the figure with references to transit usage figures for the Outer Mission (32 percent), Richmond District (47 percent), and Bay Bridge (50 percent). (M, pages 130-131) In view of the overall higher income level of Crocker Hills residents and their likely higher rate of automobile ownership such comparisons may not be valid.

Although significant impacts on several San Francisco streets are noted, the table summarizing required improvements doesn't list any improvements on these segments. (L, 3-193) The question of street improvements is particularly important because of the likely overestimation of future freeway capacity. As MTC also noted in its DEIR comments, the impacts projected for San Francisco streets are probably understated because of the lack of capacity constraints on Routes 101 and 280 in the Caltrans model used by Voorhees. In view of funding problems and potential Federal air quality regulations major capacity increases on either route are unlikely. (M, page 127) The consultant conceded that the impact on San Francisco streets would be likely to increase in the event of heavily congested freeways, but that available data did not permit quantification of the potential increased impact. (M, page 133)

Probably the most significant measure which could be taken to relieve effects on both local San Francisco streets and the regional highway network would be the institution of direct no-transfer transit service from Crocker Hills to downtown San Francisco--an issue raised by the San Francisco City Planning Department in its own comments. The EIR's response for San Francisco indicated that neither the need nor viability of such a service has yet been determined, but the issue may be addressed at the specific plan stage. (M, page 278).

6. SAN FRANCISCO INTERNATIONAL AIRPORT

The EIR's analysis of projected noise exposure levels indicates that noise emanating from the operation of San Francisco International Airport will not exceed 65 CNEL, the State-mandated maximum for residential areas, within the Crocker Hills development. (M, 233) This conclusion was originally based on noise projections for SFO prepared by Wyle Laboratories, Inc. in 1973 and confirmed by more recent studies included in the Environmental Impact Assessment report for the Airport Improvement Program prepared by Landrum and Brown in May 1975. (I, Exhibits B-30, B-31) Despite the fact that the project area can be considered "acceptable" for residential use according to Federal and State regulations and that further reductions in noise levels may well occur during the course of project build-out there may still be reason for concerns that are not acknowledged in the EIR:

- a. The 65 CNEL aircraft noise exposure limit for residential areas is a reasonable and generally effective attempt to define and enforce an acceptable noise level for the average person. However, since the perception of noise and its irritation may vary substantially among individuals, the 65 CNEL limit is necessarily somewhat arbitrary. Therefore, even though the proposed development may be in conformance with the 65 CNEL limit, aircraft noise may still be bothersome or irritating to a significant number of potential residents due to the proximity of a major airport. At a minimum, specific measures to inform potential residents of this condition should be required by the County.
- b. San Francisco International Airport's noise reduction program is heavily reliant upon the utilization of operational measures which seek to divert planes from flight paths over heavily populated areas. Because of its current undeveloped state San Bruno Mountain became the focal point for these measures, with about 25% of all departures from the airport now passing directly over the project areas. (I, Exhibits B-12, B-13) One acoustic consultant estimated that on an average day some 240 or more jet aircraft climb over the area. On some days this figure may go as high as 400. (H) Past experience at SFO as well as other airports has shown that noise need not exceed the legal maximums to cause resident complaints. At times, for example, San Francisco Airport has even received calls from irate Alameda, Oakland and Piedmont residents about noise from departing planes. There has been speculation that complaints from future Crocker Hills residents about side-line noise and fly-overs may result in pressure to drop these flight tracks. Since a return to the previous major departure route, which took 95 percent of the departing

CNEL

flights from Runway 28 through the so-called San Bruno gap and over the cities of San Bruno and South San Francisco, is highly unlikely. (M, 234), the result may be heavy community pressure upon the airport to cut back operations. Aside from the direct effect on San Francisco and other travelers that could result from such a step, San Francisco taxpayers may be affected if the airport generates insufficient revenues to pay off general obligation bonds approved by San Francisco voters in past years to finance airport expansion projects.

Acoustically treating residential units to ensure compliance with statutory requirements may relieve the developer of legal responsibilities, but will not ensure against the effects of community pressure. One measure for reducing the likelihood of this effect could be some type of agreement by the developer or potential buyers indemnifying the airport against future nuisance claims based on the noise issue. Another measure would be the requirement by the County of acoustic treatment beyond the levels required in compliance with State law. The EIR concludes that adverse acoustic impacts can be mitigated by measures which "will be addressed at subsequent planning levels." (M, 234) It would be preferable if commitments could be made at this stage to take whatever actions are necessary to reduce interior noise to a specified level which may be below statutory minimums.

7. AMENITIES: RECREATION NEEDS AND SCENIC RESOURCES

In several recent planning documents, San Francisco has made reference to the amenity values of San Bruno Mountain. These concerns can usually be grouped into two categories: the suitability of the mountain as a regional park, and the values of the site as a scenic resource and an urban design element.

A. Recreation Needs

San Francisco's Recreation and Open Space Program, adopted in 1973, stated the City's interest in a San Bruno Mountain park:

"Because of the visual and recreational importance of San Bruno Mountain, city representatives should participate in regional planning efforts involving the Mountain and should take an active role in seeing that a regional park is established there." (C, page 5)

This need would appear to have been met, at least in part, by the San Mateo County proposal to establish a 1,250-acre regional park adjoining the Crocker Hills site. What remains to be determined is whether the proposed park--limited mostly to rugged steep slopes and excluding the flatter saddle area--responds to the concerns raised in the San Francisco plan.

The EIR acknowledges that San Francisco policy supports a regional park on the mountain, but suggests that the City's primary interests are in preserving the visual integrity of the mountain rather than acquisition of additional saddle land for active recreation. (M, page 121) In the absence of more specific park and recreation criteria from San Francisco, it is not possible to determine whether the Crocker Hills proposal, with its construction in the saddle area of the Mountain, would preclude important recreational opportunities for San Franciscans. However, it should be noted that, although it is difficult to determine from San Francisco planning documents whether the proposed San Mateo County park meets San Francisco's needs, the responses to the development proposal by both the Federal Bureau of Outdoor Recreation and the State Department of Parks and Recreation suggest that a major park-related project with close proximity to centers of urban concentration, such as San Francisco, definitely deserves further study. This recommendation may be particularly appropriate in light of the consultant's admission that the DEIR did not investigate the full recreational value of the mountain. (M, page 35) An obvious mitigation measure, therefore, would be to bar development from key amenity areas, such as the saddle, for as long as is possible. Such a need would be addressed by the policy recommended by the San Mateo County staff, but not recommended by the County Planning Commission for consideration by the Board of Supervisors.

"It shall be the policy of San Mateo County that development be initiated in the northeast ridge area and not commence in any other planning area until at least 60 percent of the northeast ridge development has been substantially and successfully completed in order to insure that future planning options are not restricted if changes in plans for the area were ultimately deemed appropriate." (K, VII-21)

Adherence to this policy would allow San Francisco or other regional, State or Federal agencies an opportunity to look more closely at the site and to specify action appropriate which would assure that adequate recreational values are maintained for San Francisco population.

This recommendation may be particularly appropriate in light of the consultant's admission that the assessment did not investigate the full recreational value of the mountain. (M, page 35)

B. Scenic Resources

Although there may be some question about San Bruno Mountain's recreational values to San Francisco, there is much less doubt regarding its importance as a scenic resource. The Recreation and Open Space Plan states, "The entire ridge line, highly visible from San Francisco, is a major concern to the City." (C, page 5) The question which remains is to what degree the Crocker Hills proposal would alter the mountain's current value as a dramatic backdrop to the City.

The DEIR acknowledges the substantial alteration of existing views of the mountains from San Francisco by the development proposal. It notes the impact from Interstate Highway 280, a designated scenic highway; it also includes several sketches from different sites in San Francisco, showing that the development will clearly change the current view from San Francisco of the essentially undeveloped mountain. (L, 3-89-90; M, 118-120)

Evaluation of visual impacts is a highly subjective exercise, and it is beyond the scope of this report to make a specific determination of negative impact. However, it is possible to look at how the DEIR itself has evaluated the development proposal in terms of existing policies on scenic resources and urban design. In this regard, it is important to reference the San Francisco Urban Design Plan (1971) which endeavored to specify the City's policies for such resources. The DEIR's reference to this document appears to show a lack of understanding of San Francisco's design policies, and this deficiency suggests that the true impact of development on San Francisco has not been adequately investigated. Specifically, in referring to the notion of putting large buildings and higher densities on the top of hills, as proposed by the Crocker Hills development, the DEIR says, "The concept reflects a basic principle of the San Francisco urban design concept-- enhancement of the natural land forms by placing the taller buildings

on the hills and by maintaining a low building concept--profile on lower-lying land." (L, 1-11)

The Urban Design Plan, however, makes a distinction between developed and undeveloped land, and it is probable that the policy cited was more properly directed to existing built areas of the City. A more appropriate application of the Urban Design Plan would have been to refer to those policies which specifically address natural areas, and policies which look at the relation between natural areas and built areas.

Examples of the first class of policies are:

1. Preserve in their natural state the few remaining [natural] areas that have not been developed by man; (D, page 54)
2. [Natural areas] provide people with a feeling of continuity over time, and with a sense of relief from the crowding and stress of city life and modern times; (D, page 45)

In addition, there are policies and guidelines on how the built environment can effectively relate to its natural surroundings:

1. Where large parks occur at tops of hills, low-rise buildings surrounding them will preserve views from the park and mountain and maintain visibility of the park from other areas of the City; (D, page 24)
2. Highly visible open space presents a refreshing contrast to extensive urban development; (D, page 31)
3. New buildings should not block significant views of public open spaces, especially large parks and the Bay. Buildings near these open spaces should permit visual access. . . (D, page 92)

All of the above policies speak more directly to the Crocker Hills proposal than the one policy selected in the DEIR. This failure of acknowledgment suggests that the proposal has not been evaluated in light of these design guidelines, leaving the possibility that there may be serious conflict between the development project and San Francisco's expressed concern for the visual environment.

To facilitate the process of specifying mitigation measures, it would have been helpful if the DEIR had included sketches of alternative development proposals. However, many of these visual concerns can still be addressed during the period of site development and design review. In this regard, it is significant that the San Mateo County Planning Commission has proposed that the County prepare a specific plan for each of the planning areas and that urban design concepts be specifically addressed in that plan. (K, VII-18) The conditions might then allow San Mateo County and San Francisco to work together in interpreting and applying the relative design policies to the development, and thus ensure that the scenic and design resources considered valuable by San Francisco are maintained as much as possible.

SUMMARY AND CONCLUSIONS

I. MAJOR EFFECTS

The major effects that the Crocker Hills proposal is likely to have on San Francisco can be generally divided into two categories:

- direct and indirect social and economic effects that are difficult to accurately measure and difficult to mitigate; and
- direct effects on the capacity of public systems and services which can be measured with some degree of accuracy and could be mitigated.

A. The most important effects in the first group are:

1. The potential emigration of middle- and upper-income residents from San Francisco to Crocker Hills and related secondary implications for the City, including possibly reduced residential valuations and the loss of consumer revenues if those moving to Crocker Hills are not replaced by persons with similar income characteristics;
2. The potential relocation of commercial and industrial tenants from San Francisco and the attendant effects on non-residential valuations if they are not quickly replaced; and
3. A possible increase in the ratio of low- and moderate-income to middle- and upper-income residents in San Francisco as a result of project-related migration.

Of these effects, the last is the only group for which mitigation measures have been proposed. If assurances were made by San Mateo County that a minimum of 20 percent of all of the housing units in Crocker Hills would remain available at low and moderate costs--regardless of the availability of public subsidies--San Francisco would be assured that, at a minimum, those lower-paid Crocker Hills employees who are not now San Francisco residents would be able to secure accommodations at Crocker Hills. The resultant reduction in the number of units which would be available at higher prices could also reduce opportunities by that income group for out-migration from San Francisco and related effects. It is also theoretically possible that there could be some beneficial demographic effects associated with Crocker Hills if the new development caused a reduction in the demand for comparable high-priced units in San Francisco. Such units might then become more available to middle-income families who are finding it increasingly difficult to secure housing in San Francisco because of low vacancy rates and high costs. Moreover, it is unlikely that Crocker Hills would result in a significant net increase in lower-income San Francisco residents because of the same type of housing problems that are facing middle-income

families. In view of San Francisco's tight housing market, Crocker Hills employees who are not now San Francisco residents might be more likely to commute to Crocker Hills from their present homes in the region or move to Daly City or some other Peninsula community than move to San Francisco.

It is, of course, impossible to control the voluntary migration of businesses and residents from one jurisdiction to another. Revenue sharing systems or a payroll tax, which would enable a city like San Francisco to reap some tax benefits from Crocker Hills residents who work in the City, would help. The absence of these, however, does not preclude the formulation of voluntary agreements between individual jurisdictions relating to the sharing of tax revenues or the costs of necessary public improvements.

B. The significant effects in the second group, relating to impacts on public systems and services, are:

1. The potential utilization without compensation of a significant portion of the capacity of already heavily-used regional freeway links, local streets and public transit; and
2. The potential preclusion of future opportunities for San Francisco's growth because of legal obligations to provide services (primarily wastewater treatment) to other, faster growing, jurisdictions.

Although in these cases Crocker Hills may represent only a small portion of the total capacity of these systems, the Crocker Hills demand would all be generated as the result of a single development action. It is extremely significant, for example, that an estimated 5.5 percent of the peak-hour traffic on an already overcrowded segment of the Bayshore Freeway may be generated by a single development.

Mitigation measures related to this class of effects can be directed toward either reducing the demand for the service or financing the costs of capacity increases. With respect to transportation demand, for example, San Mateo County could require the provision of transit services which would reduce the demand for existing public transit and the use of highway segments. As an alternative, either the County or the developer could contribute to the cost of necessary improvements to these systems to accommodate the additional demand which would be generated by Crocker Hills. No measures along these lines have been proposed.

II. ADEQUACY OF INFORMATION

In reviewing the extensive documentation prepared by and for San Mateo County relating to this project, it appears that, in general, a sincere effort has been made to provide a thorough and adequate analysis. Furthermore, both San Mateo County and San Francisco planning department staff were of great assistance to ABAG during the preparation of this report. In the case of some of the more critical effects, such as demographic and fiscal implications, however, quantification has been extremely difficult. An attempt could have been made, of course, to consider what the effects would be if Crocker Hills were filled exclusively by San Francisco residents and businesses. Such an analysis would be of limited utility, however, to either San Mateo County or to San Francisco. It may be far more useful to determine the likely effects of the development than its worst possible implications. For this reason, more attention should probably have been given to the type of fiscal analysis conducted by Williams-Kuebelbeck and Associates. Finally, of more importance than the detailing of improbable but catastrophic results, is the formulation of viable and creative measures for reducing the more likely negative effects. While many thoughtful measures have been identified, some substantial improvement could be made by incorporating the type of measures suggested in this report.

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